

I. COMPREHENSIVE PLANNING

A. PROFILE

Authority

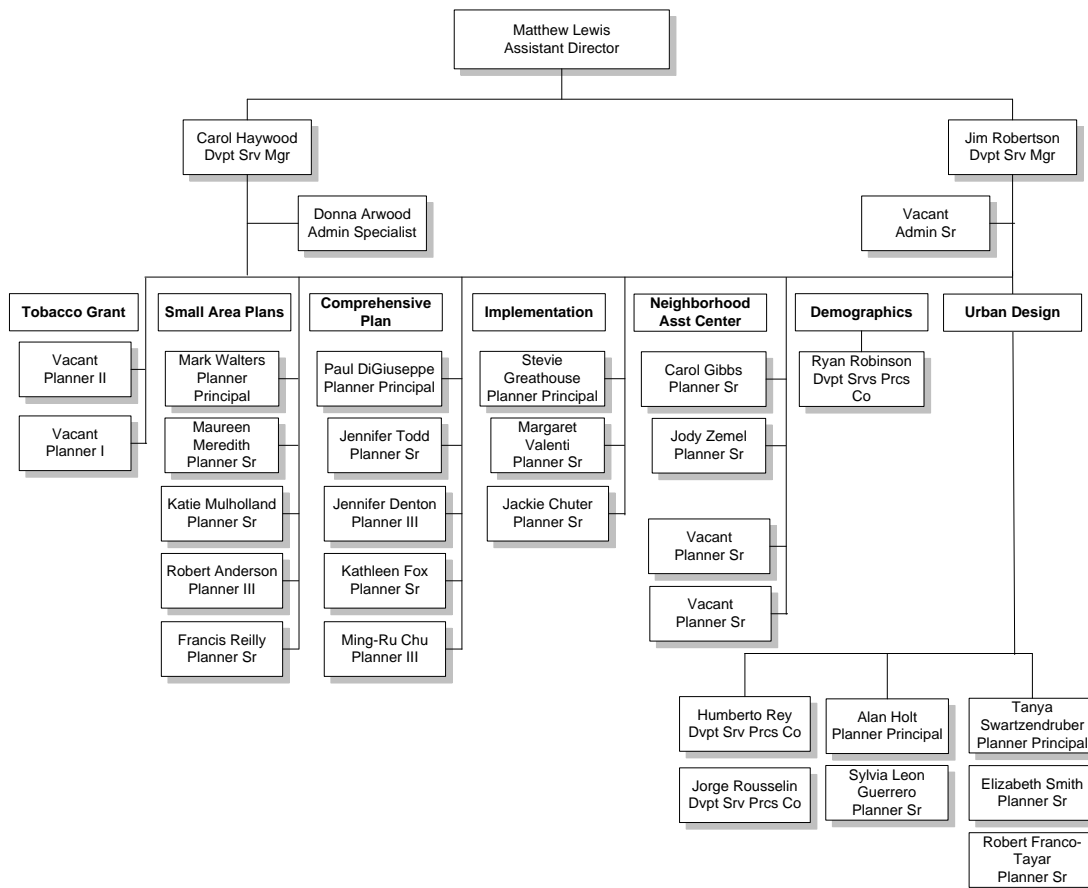
Article X of the Austin City Code establishes comprehensive planning "as a continuous and ongoing governmental function in order to promote and strengthen the existing role, processes and powers of the City of Austin to prepare, adopt and implement a comprehensive plan to guide, regulate and manage the future development within the corporate limits and extraterritorial jurisdiction of the city to assure the most appropriate and beneficial use of land, water and other natural resources, consistent with the public interest."

Organization

The organization for the Comprehensive Planning and Urban Design Division is shown in Figure __. The staff and functions are shown in Table __.

Figure 42
Organization of Comprehensive Planning and Urban Design Division

Comment [LM1]: This may change with our new business plan. Tobacco grant positions and vacant NAC positions are eliminated. Lewis



Staffing

The staff positions and brief description of their responsibilities, as of October 1, 2014, are shown below in Table ____.

Table ____
Staff and Functions in Comprehensive Planning and Urban Design Division

Position Title	Number	Responsibilities	Reports To
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	of Positions		
Assistant Director	1	Manages Division	Director
Dvpt Srv Mgr	1	Manages Comprehensive Planning Section	Assistant Director
Admin Spec	1	Administrative support to Develop Services Manager	Dvpt Srv Mgr
Tobacco Grant (Discontinued)			
Planner II	0	Supported all City departments on tobacco prevention and use restrictions	Dvpt Srv Mgr
Planner I	0		Dvpt Srv Mgr
Neighborhood/Small Area Planning			
Principal Planner	1	Oversees the area planning processes	Dvpt Srv Mgr
Senior Planner	2	Project leads on specific small-area and neighborhood planning projects	Principal Planner
Planner III	2	Corridor and neighborhood planning project support	Principal Planner
Comprehensive Plan			
Planner Principal	1	Supervises the Imagine Austin Team and provides comprehensive plan support to other divisions	Dvpt Srv Mgr
Senior Planner	1	Supports Imagine Austin Speakers Series, reviews zoning cases for plan consistency, and provides liaison with other departments and PDRD divisions	Principal Planner
Planner III	1	Supports Imagine Austin outreach, media, and liaison programs	Principal Planner
Comprehensive Plan Implementation			
Planner Principal	1	Supervision of PDRD Implementation Team members and liaison to Capital Planning Office and other CIP related planning processes.	Dvpt Srv Mgr
Planner Sr	2	Staff support of Neighborhood Plan Contact Teams and maintenance of the Small Area Plans' Recommendation Database.	Planner Principal
Neighborhood Assistance Center			
Planner Sr	2	Provides neighborhood advisor services, information and referral, liaison with CodeNEXT, and outreach to neighborhood organizations	Dvpt Srv Mgr
Demographics			
Dvpt Srvs Prcs Co	1	Performs demographic analysis and specialized mapping for PDRD and other City departments	Dvpt Srv Mgr

Urban Design			
Dvpt Srv Mgr	1	Manages Urban Design Section	Assistant Director
Admin Sr	1	Provides administrative services to the Development Services Manager	Dvpt Srv Mgr
Dvpt Srv Prcs Co	2	Project management for corridor, streetscape, and other public realm design projects	Dvpt Srv Mgr
Planner Principal	2	Project management for waterfront, corridor, and downtown planning,	Dvpt Srv Mgr
Planner Sr	3	Planning and design support for TOD, corridor planning, and "Great Streets" initiative.	Dvpt Srv Mgr
TOTAL	26		

Performance Measurements and Accomplishments

Table ____ presents some of the major tasks achieved since 2011 by the Comprehensive Planning Division staff.

Comment [PZ2]: The budget documents

Table

Performance Measures for Neighborhood Assistance, Planning, Urban Design

Activity	2011	2012	2013	2014*	2015
Neighborhood Assistance Center					
FTEs	4	4	4	4	2
# Requests for information completed per Neighborhood Advisor	376	269	260	250	275
# Requests for information submitted per Neighborhood Advisor	374	269	260	250	275
Neighborhood Planning					
FTEs	20	20	20	22	17
# of neighborhood plans adopted by the City Council	2	2	0	3	0
# of neighborhood plans scheduled on Planning Commission agenda	2	2	0	3	0

Comment [LM3]: These are not the measurements we should be evaluating our performance from. New measures are under development. Lewis

Activity	2011	2012	2013	2014*	2015
% participants satisfied with the Planning process	90.50%	94.4%	0%	70%	0
Urban Design					
FTEs	9	9	9	9	9
# downtown block faces planned per year	2.5	10	34.5	9.5	14
# new downtown block faces completed per year	3.5	8.5	4	9.5	17.5

B. POSITIVE FINDINGS

- Recently (2012) adopted comprehensive plan.
- The newly hired assistant director managing this division has taken steps to improve staff morale;
- Staff members are located in same building; The division has been able to recruit and retain highly qualified planners, designers, and other professionals; and
- The newly hired assistant director managing this division has taken steps to improve staff morale;
- Most staff members participated enthusiastically with efforts during this study; and
- Staff members are located in same building;
- The division has been able to recruit and retain highly qualified planners, designers, and other professionals; and
- Recently (2012) adopted comprehensive plan.

Comment [LM4]: Please ensure this title is consistent with all chapters. Martinez

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C. ORGANIZATION ISSUES

Management Structure

The Comprehensive Planning and Urban Design Division has experienced organizational change over the past year as the City has made the transition from drafting and adopting the "ImagineAustinImagine Austin" comprehensive plan to the ongoing support of its implementation and participation in the planning for formation of CodeNEXT, the city's

project to revise the Land Development Code (LDC). Staff members previously tasked with supporting the ~~ImagineAustin~~ comprehensive plan consulting team have been gradually reassigned into plan implementation support roles such as neighborhood group liaison, continuing public education for ~~ImagineAustin~~, or reassignment into other divisions to provide ongoing assistance with CodeNEXT.

Comment [LM5]: Who are you referring to?
Lewis

Comment [LM6]: Not a true statement. Lewis

More significantly, the former assistant director responsible for this division retired after the adoption of ~~ImagineAustin~~, leaving the position vacant between January and October of 2014. Because this retirement had been long anticipated, the division staff experienced an extended period of uncertainty and speculation regarding its future course of direction. With the recruitment and hiring of a replacement, from ~~another~~ nearby community, further changes in the Comprehensive Planning Division organization are expected--even during the stages of completing this study.

In meeting with division staff members just a few weeks after the new assistant director started work, there were many expressions of improved staff morale and optimism, ~~versus the many negative responses contained in the July/August staff surveys.~~

Irrespective of any organizational changes that might occur before this report is completed, two issues in the current structure and organization have been identified: imbalance of staff assignments and overlap in functions of the two development services managers. The manager for Plan Implementation has a subordinate staff of 16 with 5 direct reports, while the manager of Urban Design 7 subordinate staff members all reporting directly. Additionally, the neighborhood/small area and corridor planning functions are dispersed between the two managers' line organizations.

- 1. Recommendation:** The small area/neighborhood and corridor planning and urban design functions should report to one development services manager, while the ongoing ~~ImagineAustin~~ support functions should be assigned to the other development services manager.

Comment [LM7]: I'm not sold on that structure. I want my team to be adaptable and this structure would not lend itself of being very flexible. Lewis

Project Planning and Team Management

Small area/neighborhood and corridor planning/design activities are organized in project teams, with an assigned project lead directing day-to-day work. These are relatively small interdisciplinary teams with staff levels adjusted as needed during the various stages of a project. Some of the team members, especially those with specialized design skills, may be assigned to more than one team at a single time.

Some of the projects executed during 2014 included the following:

Comment [PZ8]: These titles need to relate to the organization chart. Also, not clear why to do this. The number of reports is not a good reason.

Table _____
Major FY2014 Project Planning and Support Initiatives

Project Name or Support Function	Number of Staff Assigned	2014 Hours Spent
Colony Park (NHCD)	3	139
South Austin Combined Neighborhood Plan	8	1,863
Land Development Code Revisions	4	444
Burnet Rd. Corridor Plan	3	1,009
Imagine Austin Implementation	7	4,663

Comment [LM9]: What does the intent of the table – what are you trying to convey? Not clear. Where did you get these hours? Lewis

Comment [LM10]: Can you provide more background on the data source. Lewis

Organizing and managing project teams with team members drawn, as needed, from the line organization is considered a best practice. Missing in this organizational arrangement are any type of project planning tools or reports. The City's timekeeping methods have provided a task I.D. coding system, which has allowed, with some consistencies, division staff to include project codes ongoing support task function codes on their timesheets. This has allowed the capture of data for hours spent on major projects and ongoing support functions over time. Upon request, managers in the division, ~~can however, do not~~ receive reports summarizing this data. This data, when entered consistently allows managers to:

- Keep projects on track with published schedules and deadlines;
- Measure the performance of staff members on individual projects and as a whole;
- Identify staff and resource allocation issues such as overload or assignment of redundant skills; and
- Form project staffing baseline data that can be used for future project planning, budgeting, and support of division staffing requests.

2. Recommendation: Implement consistent use and entry of Task Order Codes on timesheets used by all Comprehensive Planning and Urban Design Division staff members.

3. Recommendation: Create monthly project and ongoing task performance reports based on data extracted from timesheet data.

Comment [LM11]: This could be more functional under a different team structure. Lewis

Comment [LM12]: Report already exists. If manager request, Finance can provide. Lewis

There appears to be no management plan or system in place for executing future neighborhood/small area and corridor plan updates or master planning efforts for the regional, community, and neighborhood centers envisioned in the ~~Imagine Austin~~ Imagine Austin plan.

4. **Recommendation:** Establish a management plan for updating existing neighborhood/small area plans and for creating new plans for corridor development, regional/community/neighborhood center master plans for the future intensive development areas specified in Imagine Austin Imagine Austin.

Comment [LM13]: Yes. This process should be quick and focus on real neighborhood improvements. IA should be coding the corridors/ centers to meet the plan. Lewis

Comment [PZ14]: Is this different that Imagine Austin?

Demographer

The role of an urban demographer is to document and forecast the demands for future city services, infrastructure, and territory needed to direct city investments and growth policies in an orderly manner. In Austin, the City's demographer fills a standalone position reporting the development services manager responsible for plan implementation. There is little oversight or accountability for this position, particularly since the demographer is frequently requested by the City Manager and others to perform tasks outside of PDRD. It is important that a city of the size and stature of Austin maintains the capabilities of a credentialed demographer, but there needs to be a clear understanding of the capabilities, functions, and deliverables of this position--particularly now, after Imagine Austin Imagine Austin has been adopted. The current role and products produced is far too limited.

Comment [LM15]: This position should be integrated into the departmental work program and include a backup resource (succession planning). Lewis.

In implementing the comprehensive plan demographic analysis needs to alter its focus toward plan implementation and its related issues and constraints, such as:

- Continuous validation of past growth projections.
- Provision of urgently needed detail regarding recent and projected population growth due to natural increase versus in-migration and anticipated City annexation.
- Projections of family formation, senior service demands, and single-living accommodations. These types of issues have substantial influence on future housing needs and resulting development densities.
- Realistic assessment of the holding capacity of existing vacant lots and the redevelopment capacity of existing built-out neighborhoods to accommodate the higher population levels.
- Descriptive analysis, mapping, and projection of low- and middle-income housing requirements.
- Evaluation of the holding capacities of rural or lightly developed areas in the City's extraterritorial jurisdiction (ETJ) to accommodate regional center growth envisioned by Imagine Austin Imagine Austin.

Comment [LM16]: Urban Design is working on this. Lewis

Comment [LM17]: Demographer does in combination with others in the department including GIS. Lewis

Comment [LM18]: Is this really the role of the demographer? Lewis.

5. **Recommendation:** Prepare a work program, accountability measurements, and schedule of deliverables for the City Demographer.

D. POLICY ISSUES

Imagine Austin Implementation

~~Imagine Austin~~ Imagine Austin was adopted unanimously by City Council ~~on in the early morning hours of~~ June 15, 2012. ~~Even after four years of plan preparation and drafting, there was much controversy leading up to the moment of the plan's adoption. This controversy was primarily related to the concerns of individual residents and neighborhood organizations regarding the continuing status of adopted neighborhood plans and the protection they afforded. From the very beginnings of the process to create the plan, the Austin City Council mandated that sustainability, as it would be defined by community input, be the foundation of the plan. Upon the completion of the planning process, sustainability became defined, in part, by the establishment of complete communities across the city. These are places where one's daily needs (housing, goods and services, employment, recreation, elements of nature, etc.) could be available within a short pedestrian, bicycle, transit, or car trip. The framework for the development of these communities is expressed in the the plan's Growth Concept Map which directs Austin to grow into a city of compact urban centers of varying intensity connected by activity corridors. These corridors serve the dual purposes of being multi-modal transportation corridors and becoming places providing daily needs.~~

Comment [LM19]: Not relevant. Lewis.

Central to Imagine Austin is the projected population growth. The plan projects an additional 750,000 people to live within Austin and its extraterritorial jurisdiction by 2039. The activity centers, activity corridors, and context-sensitive infill development are central to accommodating this increase. The centers are distributed across the city and ETJ:

- 6 regional centers, each hosting anticipated populations of 25,000 to 45,000;
- 8 town centers, each with populations ranging between 10,000 and 30,000;
- 12 neighborhood centers with populations of 5,000 to 10,000 residents; and
- 9 job centers each accommodating varying numbers of jobs, depending on size and location.

Comment [LM20]: We are programing to an approach on how to handle these issues now. Lewis

While the plan's goals of creating a city of more compact and connected communities have met community support; they have also engendered vocal opposition from members of the community who question the veracity of the benefits of complete, compact, and connected communities and view this approach as a way to densify the city. Many of these opponents also view the comprehensive plan as a means to undermine the perceived authority of neighborhood plans. Attempting to address their concerns while still advancing the goals of Imagine Austin has and will be a central challenge for PDRD in general and specifically the Comprehensive Planning and Urban Design Divisions.

These concerns were valid. The ImagineAustin plan update process was framed by the nomenclature, currently in vogue with today's city planners: "compact, connected and sustainable." Memes such as this evoked images of densification in established neighborhoods through over-permissive zoning policies, allowance of accessory residential structures on all properties regardless of size or location, and other legal measures that would change the character of established residential areas.

The ImagineAustin plan itself has had a formidable mission to accomplish: the accommodation of approximately 750,000 more people, and accompanying non-residential development, within the City limits and then-existing ETJ between 2012 and 2039. The prospect of nearly doubling the population of Austin is not unrealistic, as post-recession growth rates in Austin have continued to increase. In addition to the sheer volume of expected growth, the ability to absorb new development is hampered by significant environmental limitations to intensive development in the "Hill Country" areas west of the City and the proximity of neighboring incorporated communities. To accommodate 750,000 more people, the Growth Concept Map presented in ImagineAustin envisions the following:

- 6 regional centers, each hosting anticipated populations of 25,000 to 45,000;
- 8 town centers, each with populations ranging between 10,000 and 30,000;
- 12 neighborhood centers with populations of 5,000 to 10,000 residents; and
- 9 job centers each accommodating varying numbers of jobs, depending on size and location.

These mostly new decentralized nodes of compact development would be interconnected by major highways, high-capacity transit, and multimodal "activity corridors" that serve the dual purpose of transport and accommodation of mixed-use development.

The above nodal forms of envisioned development, along with the activity corridors, are intended to accommodate most of Austin's projected 2039 growth. A substantially smaller amount of the growth would occur in the form of redevelopment and context sensitive infill within established areas. Intended forms of development would "vary with site locations, small-area plans, and development regulations, and include single family houses, duplexes, secondary apartments, townhouses, row houses, and smaller scaled apartments." A City Council mandate from the late 1990s to initiate a neighborhood planning program to develop plans for established, urban core neighborhoods has been a significant City of Austin planning function for a decade and a half. During this period very little planning attention has been given to developing area on the periphery of the city. Although a major focus of Imagine Austin, no significant planning attention has been given to the centers and corridors in these areas since the plans adoption.

Comment [PZ21]: Can we work this differently? Moves us too far into policy and an opinion.

Comment [LM22]: I think we need to have our work plan and target items approved by resolution of the new council. Lewis

Comment [PZ23]: Spelling?

Comment [LM24]: These are important matters but should be evaluated in CodeNEXT. Lewis

Comment [PZ25]: The way your described it in our telephone conversation was much clearer. I thought you said that some of the concerns were a miss reading of what the plan actually says or does. We could have a paragraph or two and suggest staff should develop a strategy or at least explanation of how they will address the residential concerns.

Comment [LM26]: We are programing to an approach on how to handle these issues now. Lewis

~~The activity corridor and infill/redevelopment components of ImagineAustin have received the greatest amount of attention, both by the public and within PDRD. Most of the efforts of the Comprehensive Planning Division have been focused on neighborhood/small area activity corridor planning for established areas, rather than on master planning and implementation measures needed in formation of the envisioned regional, town, and neighborhood centers. It is in these areas that most of Austin's future projected growth will occur.~~

6. **Recommendation:** Comprehensive Planning should focus greater plan implementation and master planning resources on the regional, community, and neighborhood centers that are identified in the Growth Concepts Map of ~~ImagineAustin~~Imagine Austin.

Comment [LM27]: Agreed. Lewis

As time passes, the land areas in the vicinities of the identified regional, town, and neighborhood centers will experience increased development pressure. If left unplanned and zoned for sprawling low-density suburban or estate development, these undeveloped or partially developed areas will be at increasing risk of permanent loss due to preemptive low density development.

7. **Recommendation:** Impose and vigorously maintain rural zoning policies in the areas intended in ~~ImagineAustin~~Imagine Austin as regional, community, and neighborhood centers. Investigate measures for development rights transfer, partnership with viable large-scale developers, or outright acquisition.

Comment [LM28]: TDR will not be effective in the current code. I think it could be a useful tool but has not been effective that I'm aware of. Lewis

Comment [LM29]: Written as a policy statement. How is this a process improvement? Lewis.

Following the adoption of ~~ImagineAustin~~Imagine Austin, the City of Austin began center of attention for implementation of the priority programs including shifted to updating the City's Land Development Code with the CodeNEXT project. While the CodeNEXT consulting team's Land Development Diagnosis Report identified the future emergence of the proposed nodal activity centers and the requirements for appropriate zoning, the report underplayed the importance of these areas as the containers of most of Austin's future growth. Most of the CodeNEXT main focus to date has been on existing neighborhoods, downtown, and other established areas. The greatest opportunities for future community building and applying the principles of "new urbanism" in Austin and implementing the goals of teh comprehensive plan will be in the greenfield development center areas where the larger share of Austin's future inhabitants will reside.

8. **Recommendation:** Add emphasis to ~~ImagineAustin~~Imagine Austin's proposed new regional, town, and neighborhood centers in the CodeNEXT LDC update process.

Comment [LM30]: This recommendation should be move to CODENext section. Recommendation 7 and 8 seem to conflict with each other. Adams and Lewis.

Comprehensive plans in most urban cities in the U.S. include infrastructure elements with accompanying maps that conceptualize long-range utility service areas, treatment plants, and other key utility components. These are not present in the ~~ImagineAustin~~Imagine Austin plan. While the plan does provide reference to the need to coordinate with Austin

Utilities and other agencies in their infrastructure planning efforts, there is little regard to the enormity of extending infrastructure and expanding (nearly doubling) capacities to accommodate the City's projected growth over the next 25 years.

9. Recommendation: Working with Austin Utilities and departments responsible for other infrastructure services, prepare and adopt an infrastructure element for ~~ImagineAustin~~Imagine Austin.

The same principle applies to long range transportation facilities needed to support ~~EnvisionAustin~~Envision Central Texas. The 2035 Regional Transportation Plan of the Capital Area Metropolitan Planning Organization (CAMPO) has based its improvement recommendations on a series of large, medium, and small growth centers that appear to be based in the City's 1979 Comprehensive Plan for contiguous, circumferential development rather than the decentralized satellite activity centers in the current Plan. Inserting the activity centers depicted in the Growth Concept Map Centers of ~~ImagineAustin~~Imagine Austin is likely to have substantial impact on CAMPO's transportation modeling and planning outcome, as the organization undertakes its 2040 plan update.

10. Recommendation: Continue coordination activities with the Capital Area Metropolitan Planning Organization to include the ~~Growth EnvisionAustin~~Growth Concept Centers Map in their transportation planning process.

Neighborhood and Small Area Planning

Neighborhood-level planning has been integral to the planning process in ~~Austin for Austin~~ for many years. ~~The 1979 Austin Tomorrow comprehensive plan was formed, in part, by stitching together many of the existing individual neighborhood plans.~~ Through formation of "neighborhood plan contact teams" (NPCTs), the current LDC allows NPCT ~~members officials~~ to initiate amendments to Future Land Use Map (FLUM) and affords them greater status in responding to zoning changes through submittal of a formal Contact Team Recommendation Letter. ~~The focus on central city neighborhoods has also created inequity among those areas with neighborhood plans and those without. The capacity of Comprehensive Planning staff to address this inequity by creating plans and forming contact teams for those unplanned areas is hampered by resources and the time required creating these plans. In addition, continuing the approaches used in earlier planning efforts will result in increased staff attrition and the loss of experienced and talented planners. Ultimately, the decision as whether and how to address this inequality will be a political one and resides with the elected officials.~~

The Comprehensive Planning Division includes a group in the organization structure called the Neighborhood Assistance Center. It was formed to assist ~~in the formation and support of NPCTs to and neighborhood groups -guide them through the neighborhood planning process. It also supports day-to-day neighborhood quality of life issues by~~

Comment [LM31]: Lewis to rewrite section.

providing guidance on code enforcement, neighborhood crime watch, trees and landscaping, community clean-ups, and similar topics.

The importance of neighborhood planning was reaffirmed in the 2008-2012 ~~ImagineAustin~~ Imagine Austin planning efforts through an extensive array of public meetings, workshops, social media, and other outreach efforts. The ~~ImagineAustin~~ Imagine Austin plan document includes explicit reference to the continuing validity of established neighborhood plans and ongoing neighborhood, small area, and corridor planning projects.

Comment [LM32]: We just have to redefine the structure that NP's are completed and implemented. Lewis

It appears, however, that the definition of the actual physical boundaries of neighborhoods have been inconsistent and, in some instances, incoherent. In the initial stages of neighborhood planning, boundaries were ~~often based on~~ initiated by homeowners' neighborhood associations and defined by those geographies' legal boundaries rather than the traditional perception of a neighborhood (often based on school attendance patterns or common geographical characteristics). In many cases, the boundary line between two neighborhood plan areas would be the centerline of a major street--leaving the street faces to be addressed in separate planning projects. The acreages and population levels of neighborhood plan areas vary substantially. Some neighborhood organizations have been very active, others inactive.

As of 2014, there are ~~530~~ 530 active neighborhood planning areas (NPSs) with approved plans, ~~3 that are in current stages of planning, and 43 that suspended their plans, and -~~ Also, there are 3 areas that have been designated as future NPAs. These NPAs cover a diminishing fraction of the City's land area. As the City continues to grow, it will be increasingly challenging for staff to maintain a cycle of plan updates, provide new planning initiatives for existing areas or neighborhoods that lack plans, or to support the planning requirements for the new communities that will emerge within the 26 or so new activity centers postulated in ~~ImagineAustin~~ Imagine Austin. Staff in the Comprehensive Planning Division have recognized this challenge and have acted to redefine the neighborhood plan update cycle by performing plan updates for combined neighborhoods (such as in South Austin) and by placing greater emphasis on small-area or corridor plans, which can span existing neighborhood boundaries. The City's recent "10-1" conversion to ward representation is likely to influence further the future configuration of NPAs.

- 11. Recommendation:** Initiate a long-term process to redefine neighborhood planning boundaries and reorganize neighborhood contact groups into a larger, geographically coherent, and more manageable number of entities.

The neighborhood advocacy functions of the Neighborhood Assistance Center and of some staff members in the Small Area Plan Implementation group are perceived by others in the Comprehensive Planning Division as being incompatible to the larger long-range planning and design functions of the division. This has contributed to organizational stress, low morale, and the lack of consensus in the division's mission.

Comment [LM33]: The new process will remove these issues. Lewis

- 12. Recommendation:** ~~Establish consensus in the role of advocacy planning as a part of plan implementation.~~ Provide stronger supervision, better definition of work programs, measurable performance goals for the Neighborhood Assistance Center.

Comment [LM34]: No. NAC is an information center for neighborhood organizations and not intended to promote City of Austin policy but to explain and inform. Lewis.

E. PROCESS ISSUES

Future Land Use Map (FLUM) Consistency Review

The Comprehensive Planning and Urban Design Division is responsible for reviewing all permit applications for consistency with the FLUM. One staff member of the ~~Imagine Austin~~ Imagine Austin implementation team, a principal planner, conducts these reviews. This is the only role that the Comprehensive Planning and Urban Design Division has in the application development process. This is a routine task that seldom requires the proficiency of a principal planner.

- 13. Recommendation:** Delegate the FLUM consistency review to a subordinate position, or reassign it entirely to the Land Use Division while maintaining coordination with the ~~Imagine Austin~~ Imagine Austin Implementation team.

Comment [LM35]: We need to also look at how it fits into the overall zoning process. We have talked about having a citywide FLUM.